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UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF THEIR STATEMENT  
IN RESPONSE TO PARAGRAPH 3  
OF ORDER RE EARLY MOTIONS  
IN *LIMINE* AND RELATED  
MATTERS (DKT. 784)**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Statement in Response to Paragraph 3 of Order Re Early Motions in Limine and Related Matters (Dkt. 784). Specifically, Defendants request an order granting leave to file under seal the following documents:

Document	Portions to Be Filed Under Seal
Statement in Response to Paragraph 3 of Order Re Early Motions in Limine and Related Matters (Dkt. 784)	Highlighted Portions

These portions have been designated by Waymo as “Highly Confidential – Attorneys’ Eyes Only” in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed govern this case (Transcript of 3/16/2017 Hearing, page 6). Defendants take no stance on whether this material merits sealing, but are required to file this material under seal in accordance with Paragraph 14.4 of the Protective Order.

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on July 7, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and designate the service copies of these documents as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

1 Dated: July 7, 2017

MORRISON & FOERSTER LLP

2  
3 By: /s/Karen Dunn

KAREN DUNN

4 Attorneys for Defendants  
5 UBER TECHNOLOGIES, INC.,  
6 OTTOMOTTO LLC, and OTTO  
7 TRUCKING LLC  
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